

AUG 02 2024

KEVIN P. WEIMER, Clerk  
By: *Cwm* Deputy Clerk

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

SANJAY PATEL

Criminal Information

1:24-cr-225

THE UNITED STATES CHARGES THAT:

**Count One**  
**(18 U.S.C. § 641 – Theft of Government Funds)**

1. On or about November 10, 2020, in the Northern District of Georgia and elsewhere, the defendant, SANJAY PATEL, knowingly and willfully stole, purloined, and converted to his use a thing of value of the United States exceeding the sum of \$1,000, namely, a fraudulently procured EIDL loan in the amount of \$149,900 issued to PATEL by the United States Small Business Administration.

All in violation of Title 18, United States Code, Section 641.

**Count Two**  
**(18 U.S.C. § 1957 – Money Laundering)**

2. On or about the date listed below, in the Northern District of Georgia and elsewhere, the defendant, SANJAY PATEL, did knowingly engage and attempt to engage in the following monetary transaction by, through, and to a financial institution, affecting interstate and foreign commerce, knowing that such transaction involved criminally derived property of a value greater than \$10,000,

such property having been derived from a specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343:

Count	Date	Transaction Type	Originating Account	Payee/Recipient	Amount
2	5/14/2020	Wire	Worden & Asociados First Citizens Bank x8862	Kodyco Holdings International Inc. Bank of America x7325	\$250,000

All in violation of Title 18, United States Code, Section 1957.

#### Forfeiture

3. Upon conviction of the offense alleged in Count One of this Information, the defendant, **SANJAY PATEL**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to said violation, including, but not limited to, the following:

MONEY JUDGMENT: A sum of money in United States currency, representing the amount of proceeds obtained as a result of the offense alleged in Count One of this Information.

4. Upon conviction of the offense alleged in Count Two of this Information, the defendant, **SANJAY PATEL**, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or

personal, involved in such offense, or any property traceable to such property, including, but not limited to, the following:

MONEY JUDGMENT: A sum of money in United States currency, representing the amount of proceeds obtained as a result of the offense alleged in Count Two of this Information.

5. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

the United States intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property.

RYAN K. BUCHANAN

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